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Stone & Webster Environmental Technology & Services

**RESPONSIVENESS SUMMARY FOR THE
ENGINEERING EVALUATION/COST ANALYSIS (EE/CA)
Study Area 4
NCBC - Davisville, Rhode Island**

The purpose of this Responsiveness Summary is to review public response to the EE/CA for removal action with respect to Study Area 4 at the former Naval Construction Battalion Center (NCBC) in Davisville, Rhode Island. Study Area 4 consists of asphaltic material which has been disposed of in two locations in a trench at NCBC Davisville. In addition, this Responsiveness Summary documents the Navy's consideration of public comments during the decision-making process and provides answers to any major comments raised during the public comment period.

The Responsiveness Summary is divided into the following sections:

Overview - This section briefly describes the removal action alternative recommended within the EE/CA, and any impacts on the EE/CA due to public comment.

Background on Community Involvement - This section provides a summary of community interest in the proposed remedy and identifies key public issues. It also describes community relations activities conducted with respect to the area of concern.

Summary of Major Questions and Comments - This section provides a summary of the major written comments received during the public comment period.

This revision to the Final Responsiveness Summary, which was issued September 19, 1995, has been issued in order to respond to comments from the Environmental Protection Agency, dated 10 August 1995.

OVERVIEW

In the EE/CA issued for public comment in July 1995, the Navy evaluated the existing data and determined that a removal action at Study Area 4 would be of a non-complex nature and would bring the Study Area into compliance with Rhode Island General Law (RIGL) 23-18.9-5, which requires removal of solid waste greater than three (3) cubic yards. The removal action includes only soil and asphaltic material. Ground water beneath Study Area 4 will be addressed as a separate operable unit. The preferred alternative was selected in coordination with the U.S. Environmental Protection Agency (EPA) and the Rhode Island Department of Environmental Management (RIDEM). No written or verbal comments from the public were received on the preferred removal action alternative.

BACKGROUND ON COMMUNITY INVOLVEMENT

Throughout the remedial investigation activities, the Navy, RIDEM, and EPA have been directly involved through project review and comments. Periodic meetings have been held to maintain open lines of communication and to keep all parties abreast of current activities.

A Fact Sheet announcing the availability of the EE/CA for Study Area 4 was mailed out to community members on the general mailing list. Notices of the availability of the EE/CA appeared in the North Kingstown Standard-Times on 20 July 1995 and in the Providence Journal Bulletin on 24 July 1995. The notices summarized the preferred removal action alternative. The announcement also identified the location of the administrative record and information repository, the length of the public comment period, and the address to which written comments could be sent.

SUMMARY OF MAJOR QUESTIONS AND COMMENTS

No verbal comments were received on the proposed removal action alternative. One set of written comments on the EE/CA was received from the EPA during the public comment period. Presented below is a summary of the major comments received during the comment period and the Navy's responses to those comments.

EPA WRITTEN COMMENTS

Comment: Update the Region III risk-based concentrations using the Screening RBC tables for January - June 1995. Please note that for screening purposes, non-carcinogen values should be based on a hazard quotient of 0.1 not 1.0 to account for cumulative risks.

Response: *From the telephone conversation on November 3, 1995 between Stone & Webster and the EPA, it was concluded that Stone & Webster will not change the risk assessment as it appears in the EE/CA. This conclusion was reached after consideration that the proposed removal action would not be altered upon revision of the risk assessment, and the contaminants of concern would remain the same. In addition, the EPA guidance document using the hazard quotient of 0.1 vs. 1.0 was not released until August, 1995. The EE/CA was issued July 20, 1995.*

Comment: The Navy is performing a removal action, not a remedial action at this site. The SASE report for Site 4 should have been included in the preparation of this EE/CA.

Response: *The comment will be incorporated into the Non-Time-Critical Action Memorandum (Action Memorandum) as the proposed action has been called "removal" not "remedial". The Study Area Screening Evaluation (SASE) was included in the preparation of both the EE/CA and the Action Memorandum.*

Comment: Give examples of other potential contaminants at SA 4.

Response: *Examples of other potential contaminants at Study Area 4 are polychlorinated biphenyls (PCB), lead and beryllium. These will be included in the text and are presented in Table 2-1 of the Action Memorandum.*

Comment: Has the Navy considered using the resulting asphalt batching materials on site to pave the existing road network?

Response: *The Navy does not have plans to pave the existing road network at the base, therefore has not considered using the resulting asphalt batching materials on the base.*

Comment: Five year reviews are required by the National Contingency Plan (NCP) if as a result of a **remedial** action contaminants are left on site that preclude unrestricted use.

Response: *The discussion of 5 year reviews will be removed from the description of the EE/CA in the Action Memorandum as it is the Navy's understanding from the EPA that 5 year reviews are not generally discussed in the removal action memorandum. The discussion of 5 year reviews will be reserved for a Record of Decision for this study area.*

Comment: Text should state that the no action alternative is not a permanent solution.

Response: *The text of the Action Memorandum will be modified to reflect this statement.*

Comment:

- ▶ In the Applicable or Relevant and Appropriate Requirement (ARAR) tables, delete State and Federal Lead Guidance since there is no indication of lead exceeding action levels at this site.
- ▶ Also, delete all Wetlands references.
- ▶ Insert the Rhode Island Clean Air Act (RIGL, Title 23, Chapter 23), *General Air Quality and Air Emissions Requirements, RI Air Pollution Control Regulations*, RI Dept. of Health, Div. of Air Pollution Control, effective 8-2-67, most recently amended 5-20-91.

- ▶ Add the following regulations: Regulation No. 1 - Visible Emissions, Regulation No. 5 - Fugitive Dust, Regulation No. 7 - Emissions Detrimental to Person or Property and Regulation No. 17 - Odors.
- ▶ Revise the Action to Meet ARAR in the Federal On-site/Off-site Treatment/Disposal to include the description of the waste which is addressed in the removal action as a listed or characteristic waste under RCRA.
- ▶ Delete the entry for the Hazardous Materials Transportation Act since this action will be off-site.

Response: All ARAR tables will be extensively revised to include all new regulations referenced herein. In addition, both lead and wetlands references have been removed from the tables. All comments to the ARAR tables will be incorporated and the revised tables will appear in the Action Memorandum.

CONCLUSIONS:

This set of comments and proposed responses will be incorporated into a Final Action Memorandum for Study Area 4, expected to be completed in December 1995.